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10 *Counsel for Defendant*
Equifax Information Services LLC

11
12 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
13

14 MELISSA JEAN COLEMAN,
15 Plaintiff,
16 v.
17 EQUIFAX INFORMATION SERVICES,
LLC,
18 Defendant.
19

Case No.: 2:24-cv-00398-ART-DJA

**STIPULATION AND ORDER TO
EXTEND PRETRIAL DEADLINES**

(Second Request)

20 Plaintiff Melissa Coleman and Defendant Equifax Information Services LLC hereby
21 stipulate and agree as follows:

22 WHEREAS, on September 12, 2024, this Court granted the parties' first stipulation to
23 extend pretrial deadlines. *See* ECF No. 31.

24 WHEREAS, the current deadline to complete discovery is December 16, 2024, and the
25 dispositive motion deadline is January 14, 2025. *Id.*

26 WHEREAS, the parties have completed the following discovery to date: served and/or
27 responded to written discovery, issued third-party subpoenas, taken the oral deposition of Plaintiff,
28 exchanged expert disclosures, and scheduled the deposition of Equifax's corporate representative

1 for December 13, 2024. Equifax has also issued deposition subpoenas to several of Plaintiff's fact
2 witnesses, which have been noticed for December 11, 2024.

3 WHEREAS, the parties have engaged in a number of meet and confers regarding ongoing
4 discovery issues that the parties have been actively attempting to resolve without the need for Court
5 intervention. While the parties have successfully resolved many discovery disputes informally, the
6 issues presented in Plaintiff's Motion to Compel Further Answers to Plaintiff's Request for
7 Interrogatories (ECF No. 18) remain pending before the Court. Moreover, Equifax anticipates filing
8 a motion for protective order as to certain topics of examination proposed by Plaintiff for the
9 deposition of Equifax's corporate representative. The parties also anticipate that Plaintiff's fact
10 witnesses will be unavailable for their scheduled deposition due to the upcoming holidays, which
11 will require those depositions to be pushed further out than initially anticipated. In addition, counsel
12 for Equifax who primarily handled this matter has been on extended maternity leave, requiring
13 additional time for new counsel for Equifax to get up to speed.

14 WHEREAS, the parties require more time to adequately complete oral discovery and
15 prepare their dispositive motions. As such, considering the above, the parties stipulate and request
16 that the Court approve the following briefing schedule:

Event	Current Deadline	Proposed Deadline
Discovery cutoff date	December 16, 2024	February 14, 2025
Dispositive motions	January 14, 2025	April 14, 2025
Pretrial order	February 14, 2025	May 14, 2025

21
22 WHEREAS, this extension will allow the parties sufficient time to complete discovery,
23 including taking of third-party depositions and acquiring all documents from third-parties, facilitate
24 settlement negotiations, allow additional time for the parties to attempt to resolve any remaining
25 discovery disputes without need for further Court intervention, and allow sufficient time for the
26 parties to prepare dispositive motions.

27 WHEREAS, this is the parties' second request for an extension of pretrial deadlines. This
28 stipulated request is filed in good faith and not for the purposes of undue delay.

1 **IT IS SO STIPULATED.**

2
3 DATED: December 4, 2024

Respectfully submitted,

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5 By: /s/ Melissa Jean Coleman

By: /s/ Jennifer R. Brooks

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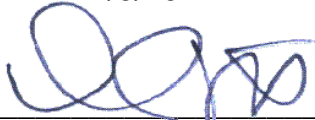
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9 *Pro Se Plaintiff*

Counsel for Defendant
Equifax Information Services LLC

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15 **IT IS SO ORDERED.**

16 DATED: 12/5/2024

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18 _____
19 DANIEL J. ALBREGTS
20 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2024, I presented the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Jennifer R. Brooks

Jennifer R. Brooks

Counsel for Defendant

Equifax Information Services LLC